

**REMARKS**

In response to the Examiner's Action mailed on November 15, 2006, claims 1 to 21 are amended and the Applicant would like to respectfully requests that the patent application be reconsidered and allowed.

An item-by-item response to Examiner's objections or rejections is provided in the followings:

**1. *Rejection of Claims Under 35 USC 103:***

The Examiner rejects claims 1-21 under 35 U.S.C. 103(a) as being unpatentable over Rivette et al., US 5,991,780 A priority filed 11/19/1993 in view of Krause et al., US 5,625,827 filed 12/23/1994.

According to the Examiner, the independent claim 1, Rivette teaches a document reading means for reading a document having textual descriptions and at least a drawing having at least a graphic element assigned and illustrated with an alpha-numeral designation, wherein said document reading means is further provided for converting said graphic element with said alphanumerical designation and said textual descriptions to a plurality of processor-recognized elements in fig. 9 and 10. Fig. 9 demonstrates how the documents arrive in electronic format from the Patent and Trademark Office and then in fig. 10 displays the process of converting the documents into process-recognized elements. Rivette also teaches a search and link means for searching said processor-recognized elements and linking alpha-numeral designations with at least one associated segment of the textual description including the alpha-numeral designation wherein the alpha-numeral designation designating a naming term illustrated by the graphic element in fig. 35 and 36, col. 3 lines 28-51, and col. 29 line 65 – col. 30 line 20. Rivette describes how the text and image files are synchronized to produce Equivalent Files. The files are the equivalent of the elements and synchronized is the equivalent of linking in the claimed invention. Applicant's specification in page 3 lines 6-9 further discloses that products for searching and linking text to graphic elements are commonly available in the market. Rivette teaches the display of both graphics and associated text including the column and line numbers of said text on the screen immediately next to one

another in both fig. 33, col. 3 line 66 to col. 4 line 5, and col. 4 lines 19-24. Fig. 33 shows and col. 4 lines 19-24 explains a patent image window immediately next to a window of associated text. What Rivette does not teach is each naming-term displayed immediately next to the graphic elements illustrated with the alpha-numeral designation assigned to each graphic element whereby a document reviewer can directly and graphically view and associate the graphic element together with the naming term.

According to the Examiner, Krause teaches each naming-term displayed immediately next to the graphic elements in fig. 3-5 and col. 5 lines 7-18. The graphic elements and the text labels and text descriptions are all readily available to the user on one screen. Krause teaches in col. 5 lines 7-13 that both a name and label are placed upon the graphic at each of a plurality of hotspots. Furthermore, Krause teaches in fig. 3b that each hotspot has unique coordinates to uniquely identify each hotspot and consequently each graphic element identified by each hotspot is likewise uniquely identified by individual coordinates related to the location of the hotspot. Krause teaches in col. 5 lines 14-18 that a user may select, using a mouse or keyboard, said hotspot to display an associated segment of textual description. Krause teaches that the hotspots annotate a primary document and link to a textual description in a secondary document. These documents could be document parts for example in a hierarchical compound document and thus the textual description invoked by the hotspot could be part of the same document as the graphical document containing the hotspot.

According to the Examiner, it would have been obvious to one of ordinary skill in the art at the time the invention was made to have modified Rivette with Krause and teachings of Applicant's disclosure to create the claimed invention. One of ordinary skill in the art would have taken the text of Rivette and used it to replace the numbered labels on the images, as is done in Krause, through the use of automatic link generation systems and techniques which Applicant's specification teaches were readily available in the market. It would have been obvious and desirable to make this modification such that the combined image and text information would have been easier to read.

Furthermore, the Examiner indicates that Applicant's arguments filed 10/12/2005 have been fully considered but they are not persuasive. Regarding Applicant's arguments in pages 24 and 25 that Rivette, Krause, and Applicant's

background disclosure do not teach or suggest all the limitations of independent claims 1, 9, 13, and 19, the Examiner respectfully disagrees. The Examiner believes Rivette teaches linking between an alpha-numeral designation and an associated naming term in fig. 35 and 36, col. 3 lines 28-51, and col. 29 line 65 – col. 30 line 20. Applicant's specification in page 3 lines 6-9 also discloses that products for searching and linking text to graphic elements are commonly available in the market. The Examiner believes Krause teaches a drawing that displays a naming term with an alpha-numeral designation immediately next to a graphic element in fig. 5, col. 3 line 58 – col. 4 line 32, and col. 7 line 45 – col. 11. Krause shows that a naming term is displayed at the associated graphic element, called a hotspot by Krause. Krause also teaches in col. 4 lines 16-32 and col. 7 lines 28-43 that the hotspot may point to a frame, which is a selected textual portion from within a document. Therefore, the hotspot of Krause does not necessarily point to another document and thus Krause teaches that the associated textual descriptions for a hotspot may all be drawn from a single document. Finally, the Examiner believes Krause shows a naming terms in fig. 5 and col. 4 lines 25-33. Therefore, a naming term is displayed on the graphic element hotspot of Krause as is shown in fig. 5. Since Rivette teaches synchronizing a naming term and a graphic element and Krause teaches displaying a name or label immediately next to an associated graphic element, the Examiner believes the combination of Rivette, Krause, and Applicant's background disclosure teach or suggest all the limitations of the claimed invention. One of ordinary skill in the art at the time of the invention would have been motivated to have improved the information synchronization of Rivette with the associated naming term and graphic element display of Krause so that it would have been easier for the document reviewer to have read the information as is taught by Krause in col. 7 lines 45-62. It is for at least these reasons the Examiner maintains the rejection of claims 1-21 as being obvious over Rivette, Krause, and Applicant's background disclosure.

In response to the rejections, claims 1 to 21 are amended to more clearly and specifically differentiate the invention directed by the amended claims from the disclosures made by Rivette and Kraue. Furthermore, the Applicant would like to respectfully requests that the Examiner withdraws the rejections based on the reasons that Krause actually teaches away from the invention directed by the claims as presented now. Therefore, a combination of Rivette with Krause would not be sufficient to render the present invention obvious.

- 1) Krause teaches a system for storing construction drawings and blueprints in multiple files. Krause's system does not have a textual description of each graphic element and cannot provide a "naming term" as now included in claim 1 and all the independent claims. The Examiner reason for rejection based on Fig. 5 of Krause by indicating that Krause presented a "naming term" therefore lacks proper basis.
- 2) Krause's Title, Abstract and all the descriptions of Krause' invention do not present a relevant part about textual descriptions of graphic element that may be designated as a "naming term" Specifically, the textual description as presented in Krause is a "note" as present in Krause's descriptions as "A" hotspot will call up a **textual description** which is in a **note or text file named A** in memory 30 as illustrated in FIG. 5. Subsequent activation of the hotspot "B" will call up the **B file** and display same in a cascade fashion on the computer screen as in FIG. 5. The B file may be a sectional view as is illustrated. Thereafter, each of these documents may be exited in order to return and display the full primary document as in FIG. 4". Each of these hotspots is presented as a separate file. Such system and method of review are totally different than what are now directed by the claims as now presented.
- 3) The Examiner states "Krause teaches in col. 5 lines 7-13 that both a name and label are placed upon the graphic at each of a plurality of hotspots." However, the "name and label" is NOT the "name of the graphic element" as a "naming term". Rather, such "name and label" that the Examiner relies for rejections are "names and labels" of files or documents. Specifically, Krause descriptions present "The visual indicator 55 generally includes a **name** which is a **name of a secondary file** within a symbol. The indicating means 48 includes labeling means 50 which places a **name and label** at the hotspot 55 which **identifies the secondary document by file name**. It is to be further understood that a secondary or detail document may act as the primary document so that it may include a hotspot 55 which references a different secondary document for call-up. The indicating means 48 also includes linking means 52 for displaying the **secondary document when the hotspot 55 is activated**. Activation of a

hotspot 55 occurs by clicking or actuating the hotspot 55 by the mouse/cursor 20, or using the keyboard 16 with cursor/enter. The linking means 52 accesses the **name of the secondary document in the hotspot 55** to call up the secondary document. The secondary file is identified by the name in the hotspot 55, and the processor means 13 automatically displays the secondary document upon activation of the hotspot 55. It is to be understood that the secondary document may be comprised of either graphic drawings or text, or may cause other external devices to be activated. The secondary document identified by the hotspot 55 is placed on top of the primary, calling document on the display screen 14, as subsequently discussed". According to Krause's own descriptions, Krause's name or label has nothing to do with graphic element related to the "naming term" within the context of this invention. Therefore, by taking the "name or label" in Krause descriptions as basis of rejection does not match with the true meaning of what Krause has presented in his own presentation.

- 4) The Examiner quotes different parts of Krause's patent with "name" or "label", for instance, the Examiner cited: Column 3, line 58 to col. 4 line 32, col. 7 line 45 to col. 11. However, one can easily search and find the "name" included in these sections are all for "name of file", "name of page", "name of frame", or name of document". None of these names is a name of a graphic element. These names are irrelevant to the present invention that designated as a "naming term" for describing a "graphic element". The Applicant believes that the Examiner has misread the invention disclosed by Krause and misplaced the basis of rejection on Krause.
- 5) The Examiner further states "Krause also teaches in col. 4 lines 16-32 and col. 7 lines 28-43 that the hotspot may point to a frame, which is a selected textual portion from within a document". However, a more detail study of Krause's descriptions will understand that a "frame" is a "frame of blueprint" or "a frame of construction drawing" in the context of Krause and that usually is a different file or document because the "call up" of a drawing or frame is by a "name" and that "name" is a "job name", a "page name" or a "file name", as that commonly presented in Krause's

document. Again, Krause's disclosures are for "document manipulation" of construction drawings that usually presented as blueprints. These blueprints are stored in multiple files and documents according to different level of details. Such hierarchical document structures and method of review and manipulations have only remote relevance to the present invention and actually teaches away from the method and document configuration of this invention.

For the above reasons, the claims 1-21 are non-obvious in view of the cited prior art references.

With the claims as now presented and the reasons provided above, the applicant hereby respectfully requests that Examiner's rejections under 35 USC § 103 be withdrawn and the present application be allowed.

Respectfully submitted,  
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By



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